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VIA ECF

May 27, 2022

Honorable William F. Kuntz, II  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Haddad v. Halabi, et al.*, No. 1:22-cv-01906-WFK-RJC

Dear Judge Kuntz:

This firm represents Defendant Soly Halabi (misidentified in the Complaint as Sauli Halabi) in the above-referenced matter. We respectfully submit this letter jointly on behalf of our client and Plaintiff Hy Haddad ("Plaintiff").

Pursuant to Rule III(E)(1) of Your Honor's Individual Motion Practices and Rules, we write to request that Your Honor approve the following agreed-upon briefing schedule with regard to a motion of Defendant Soly Halabi pursuant to FED. R. CIV. P. 11 (the "Motion"). Defendant Soly Halabi and Plaintiff Hy Haddad have agreed to the following briefing schedule:

- i) June 17, 2022 – Plaintiff shall file his opposition to the Motion; and
- ii) June 24, 2022 – Defendant Soly Halabi shall file his reply in support of the Motion.

We thank Your Honor for your consideration of this request.

Respectfully,

By: /s/ Keith A. Lazere  
**ANDERSON KILL P.C.**  
Keith A. Lazere  
EDNY Bar Number ID: KL7870

cc: Maryam N. Hadden, Esq. (counsel for Plaintiff)  
Sheldon Eisenberger, Esq.  
Neil C. Schur, Esq. (admitted *pro hac vice*)